

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

PETER GROOME,
Petitioner
v.
TIMOTHY HALL,
Respondent.

Civil Action No: 03-12397-PBS

**ASSENTED TO MOTION TO EXTEND TIME FOR PETITIONER TO FILE HIS
RESPONSE TO GOVERNMENT'S MOTION TO DISMISS AND BRIEF IN SUPPORT
OF PETITION FOR HABEAS CORPUS**

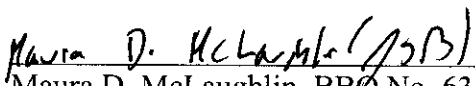
The petitioner, Peter Groome, with the assent of the respondent, moves this Court for a two-week enlargement of time, from February 5, 2004, through and including February 19, 2004, to file his brief in support of his habeas corpus petition and in opposition to the government's motion to dismiss. As grounds for this motion, the petitioner states that due to the complexity of the issues and other matters to which his counsel must devote attention, he needs additional time to prepare a comprehensive brief in this case. Among other reasons, his attorneys have had to deal with damage to their office and computer system due to a major water pipe break in their office on or about February 11, 2004. Petitioner's counsel has had to replace their entire computer system, and they have been dealing with myriad issues concerning getting their office repaired since that time.

Petitioner does not believe that a two-week enlargement of time will prejudice any party or the Court.

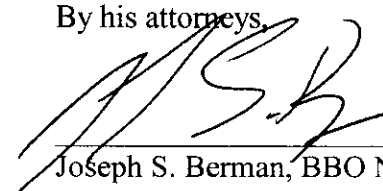
The respondent assents to this motion.

WHEREFORE, petitioner Peter Groome respectfully requests that the Court enlarge the time for filing his brief in opposition to the respondent's motion to dismiss and in support of his habeas corpus petition from February 5, 2004 through and including February 19, 2004.

Assented To:


Maura D. McLaughlin, BBO No. 634923
Assistant Attorney General
One Ashburton Place
Boston, MA 02108

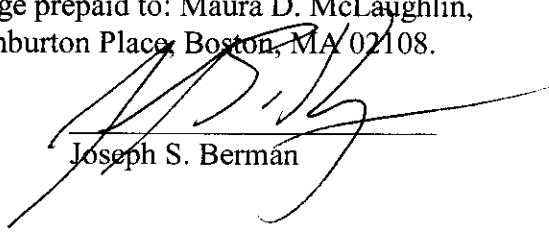
Respectfully submitted,
PETER GROOME
By his attorneys,


Joseph S. Berman, BBO No. 566006
Berman & Dowell
210 Commercial St.
Boston, MA 02109
617-723-9911

Dated: February 3, 2004

CERTIFICATE OF SERVICE

I, Joseph S. Berman, Esq., hereby certify that on this 3rd day of February, 2004 I served a copy of the foregoing by fax and first class mail, postage prepaid to: Maura D. McLaughlin, Assistant Attorney General, Criminal Bureau, One Ashburton Place, Boston, MA 02108.


Joseph S. Berman